

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

PEDRO J. ROSARIO PEREZ  
MARIA CANINO MOJICA  
DEBTORS

CASE NUM.: 11-02523 ESL

CHAPTER 13 (ASSET CASE)

CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

COMES (S) now Debtor(s) represented by the undersigned counsel and respectfully allege(s) and pray(s) as follows:

1. The undersigned attorney hereby a certificate that has notified all creditors and persons with interest as per master address list of the Chapter 13, **dated 5/17/2011.**

**WHEREFORE,** it is respectfully requested from this Honorable Court to take notice of this service.

In San Juan, Puerto Rico, this 17<sup>th</sup>, day of May 2011.

RESPECTFULLY SUBMITTED.

**/S/MARILYN VALDES ORTEGA**  
**MARILYN VALDES ORTEGA**

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United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. **11-02523-ESL**

**ROSARIO PEREZ, PEDRO J & CANINO MOJICA, MARIA**

Chapter **13**

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

<b>PLAN DATED:</b> _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> <b>AMENDED PLAN DATED: 5/17/2011</b> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>		<b>II. DISBURSEMENT SCHEDULE</b>	
<div style="display: flex; justify-content: space-between;"><div>\$ <b>760.00</b> x <b>12</b> = \$ <b>9,120.00</b></div><div>\$ <b>880.00</b> x <b>43</b> = \$ <b>37,840.00</b></div><div>\$ <b>1,080.00</b> x <b>5</b> = \$ <b>5,400.00</b></div></div> <div style="display: flex; justify-content: space-between;"><div>\$ _____ x _____ = \$ _____</div><div>\$ _____ x _____ = \$ _____</div></div> <div style="text-align: right; padding-top: 10px;"><b>TOTAL: \$ 52,360.00</b></div> <div style="margin-top: 10px;">Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows: _____  <input type="checkbox"/> Other: _____  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</div>		<div>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</div> <div>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <b>RELIABLE FINANCI</b> Cr. _____ # <b>A04024096000</b> # _____ \$ <b>989.10</b> \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <b>COOP A/C VEGA AL</b> 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>RELIABLE FINANCI</b></div> <div>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</div> <div>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.</div>	
<div style="text-align: center;"><b>PROPOSED BASE: \$ 52,360.00</b></div>		<div><b>OTHER PROVISIONS:</b> (Executory contracts; payment of interest to unsecureds, etc.) <b>TRUSTEE TO PAY ATTORNEY'S FEES BEFORE ANY SECURED OR PRIORITY CREDITOR 11 USC 330.</b>  <b>FAILURE TO TIMELY OBJECT TO THIS PLAN CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT UNDER 11 USC 1325(a)(5).</b>  <b>TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS A PERIODIC PAYMENT TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT THE COURT FOR SUCH PURPOSE.</b>  <b>STEP UP PAYMENT IN MONTH NUMBER 56 IS AT THE TIME DEBTOR PAYS OF AUTO LOAN.</b></div>	
<div style="text-align: center;"><b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)</div> <div style="margin-top: 10px;">Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <b>2,900.00</b></div>			
<div>Signed: <u>/s/ PEDRO J ROSARIO PEREZ</u> Debtor</div> <div style="margin-top: 20px;"><u>/s/ MARIA CANINO MOJICA</u> Joint Debtor</div>			

Attorney for Debtor **Marilyn Valdes Ortega Law Offices**

Phone: **(787) 758-4400**

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

**11-02523-ESL13 Notice will be electronically mailed to:**

MONSITA LECAROS ARRIBAS  
ustpreion21.hr.ecf@usdoj.gov

ALEJANDRO OLIVERAS RIVERA  
aorecf@chl3sju.com

MARILYN VALDES ORTEGA on behalf of Debtor PEDRO J. ROSARIO PEREZ  
valdeslaw@prtc.net

**I HEREBY CERTIFY:** That I have mailed by regular mail to all creditors listed.

**10-02523-ESL13 Notice will not be electronically mailed to:**

AMERICAN EXPRESS  
PO BOX 1270  
NEWARK, NJ 07101-1270

DEPARTAMENTO DEL TRABAJO  
AVE MUÑOZ RIVERA 505  
HATO REY, PR 00918

BANCO POPULAR DE PR  
PO BOX 366818  
SAN JUAN, PR 00936-6818

FEDERAL LITIGATION DEPT OF  
JUSTICE  
PO BOX 9020192  
SAN JUAN, PR 00902-0192

BANCO SANTANDER DE PR  
PO BOX 362589  
SAN JUAN, PR 00936

FIA CARD SERVICES  
PO BOX 15026  
WILMINGTON, DE 19850-5026

COOP A/C VEGA ALTA  
PO BOX 1078  
VEGA ALTA, PR 00692

RELIABLE FINANCIAL SERVICES  
9615 AVE LOS ROMEROS, SUITE  
1100

URB MONTEHIEDRA  
SAN JUAN, PR 00926

COSTCO WHOLESALE  
HSBC RETAIL SERVICES  
PO BOX 15521  
WILMINGTON, DE 19850-5521

SAM'S CLUB  
PO BOX 530942  
ATLANTA, GA 30353-0942

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
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